

THE HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

THE AGAVE PROJECT LLC, d/b/a  
THORNTAIL, and JOEL VANDENBRINK,  
INDIVIDUAL,

No. 23-1984

Plaintiff,

v.

HOST MASTER / 1337 SERVICES LLC, a ST.  
KITTS and NEVIS COMPANY, and a DOE,

Defendants.

**NOTICE REGARDING ALTERNATIVE SERVICE ON HOST MASTER/1337**

**SERVICES**

Plaintiff's The Agave Project LLC, d/b/a Thorntail, and Joel Vandenbrink ("Plaintiffs") file this notice to inform the court of Plaintiff's attempted service on Host Master/1337 Services ("Defendant").

The Court's December 29, 2023 order granted Plaintiffs' request for alternative service on Defendant Host Master/1337 via email ([whois+thorntailhardagave.com@njal.la](mailto:whois+thorntailhardagave.com@njal.la)) and P.O. box (P.O. Box 590 Springgates East, Government Road, Charlestown, Nevis, KN KN0802). (DKT. 11 at 7.) And a Summons to Defendant was issued on January 3, 2024 (DKT. 13.)

NOTICE REGARDING ALTERNATIVE SERVICE ON HOST MASTER/1337 SERVICES

- 1

LOWE GRAHAM JONES PLLC

  
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1 Prior to the court issuing the Summons to Defendant, and the Court's Order granting  
2 alternative service, Plaintiff sent a copy of the complaint to Host Maste/1337 Services on  
3 December 27, 2023. (West Declaration RE Notice Ex. A.) On January 3, 2024 Plaintiff mailed a  
4 copy of the Complaint and Summons to Defendant's P.O. box P.O. Box 590 Springgates East,  
5 Government Road, Charlestown, Nevis, KN KN080 in compliance with the Court's Order, but  
6 failed to resend a copy of the complaint with summons to Defendant's email address  
7 ([whois+thorntailhardagave.com@njal.la](mailto:whois+thorntailhardagave.com@njal.la)). (West Declaration RE Notice Ex. B.)  
8

9 On January 23, 2024, delivery of the Summons and Complaint was attempted on  
10 Defendant's P.O. box, but the delivery attempt failed. (*Id.*) Since the United States Postal Service  
11 has not succeed in delivery of the Summons and Complaint, this delivery attempt could be  
12 considered defective service. (*Id.*)  
13

14 In view of the failed service attempt through U.S. Mail, on March 21, 2024 Plaintiffs sent  
15 an additional electronic service of the Summons and Complaint to  
16 [whois+thorntailhardagave.com@njal.la](mailto:whois+thorntailhardagave.com@njal.la) consistent with the Court's December 29, 2023, order.  
17 (West Declaration RE Notice Ex. C.)  
18

19 Based on this corrected service, Defendant's answer or responsive pleading will be due 21  
20 days from March 21, 2024, or on April 11, 2024. *See* Fed. R. Civ. P. 12(a)(1).  
21

22 Assuming there is no response to the complaint and summons, Plaintiff expects to request  
23 entry of default no later than Friday April 12, 2024.  
24

25 DATED this 22nd day of March 2024.  
26

27 ///

LOWE GRAHAM JONES<sup>PLLC</sup>

By: /s/ Mitchell D. West  
Mitchell D. West, WSBA No. 53103  
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CERTIFICATE OF SERVICE

I certify that on March 22, 2024, a copy of this pleading was filed electronically with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record via the court's electronic filing system.

/s/Rischel Voigt

Rischel Voigt, Paralegal